

FCC Comments  
Robert Rightmire, WA7YNU  
839 Parkhill Drive  
Billings, MT 59102

I have read each of the four restructuring proposals (RM-10867, RM-10868, RM-10869, and RM-10870). I am considering each of the proposals based on my background. I was licensed in 1974 and I have held each of the six licenses. I currently hold the Amateur Extra license with the 20 wpm element. I have been an active ARRL Volunteer Examiner since 1999, and I also hold W5YI examiner credentials. As my busy schedule permits, my particular interests are message handling, public service, ARES, Field Day, HF, VHF-UHF, CW, SSB & FM. In my opinion, I would not hold the job the currently have had it not been for what I have learned through Amateur Radio.

I will enthusiastically support any of the options listed in these four proposals. I have served on club committees and have provided my individual comments to restructuring proposals since 1976. On almost every occasion, there were those who predicted that the changes would destroy the hobby, but I feel the hobby has improved with each change.

With this endorsement in mind, I would add the following comments for your consideration:

First, although I can remember my Novice test with great clarity and although I have taken many tests since, I cannot identify with the fear and apprehension that the candidate faces when they take the first Amateur Radio license test. Based on the reports I hear from the new hams, not much has changed. They want to do well on the test and they want to be a credit to the hobby. They call me after they have received their licenses about the “details” of setting up a first station or how to something correctly.

Second, changing the license structure, changing the names of the licenses, consolidating the licenses, or changing the questions on the tests will probably not make a big difference in the long run. I sense that many applicants are studying to pass the test rather than studying for applicable and practical knowledge. Studying for the test or tests should be considered as a first step in an ongoing process of learning about this hobby.

Third, sending code using a key and listening and copying down code, is a skill. It is not an option. If you do not know code, you cannot learn it on the spot. However, I have observed a ham who had not practiced his code since taking his test, use it on Field Day. Code must be internalized to be used. An example of an option in ham radio would be AM or SSB or FM or Digital or Packet or PSK31.

Fourth, learning code is difficult. Some have an aptitude for code and some do not. Some have physical barriers that prevents learning code. If we are not required to learn the code by the licensing authority, then we probably would not learn it. We can talk about learning and enhancement, but life gets in the way and we do not do it unless it is required for something better that we want.

Fifth, five word per minute code proficiency is not adequate for Amateurs wanting to communicate on the Amateur Radio bands. Most operators are sending code at speeds greater than 20 words per minute. With the advent of memory keyers and keyboard interface units, code speeds of 35 words per minute are also common. If we would require a code speed greater than five words per minute, we would better prepare new Amateurs for using code on the air.

Six, I disagree that the mastery of code measures the quality of a ham and their contribution to the hobby, their competency, and their service to their community. Most of the successful hams I have met in the last ten years have entered the hobby through the Technician license.

Seven, I both agree and disagree with the proposals to consolidate the number of Amateur Radio licenses. I agree it would make it more streamlined. However, I think it may not be worth the cost if these legacy license classes are disappearing without any administrative action. It has been several years since the new novice licenses, new tech plus licenses, and new advanced licenses have been issued. As a volunteer examiner, I have witnessed many hams in my community upgrade to a new license. We have had several deaths as well. I have also witnessed children who developed a short-term interest in ham radio and the license has expired without renewal. I like the name "Technician" for a license. I like it much better than "Communicator". I think it has a tradition for many active hams. Can we survey the trends and project any outcomes. Maybe the whole issue will die a natural death or become less significant.

Eight, in my experience, the use of the volunteer examination program has been a great benefit to applicants for new Amateur licenses or license upgrades. I live in a rural state with small population. In 1974, the FCC examiner tested in my city once a year and an applicant was not able to retest. In 2004, we have exams every two months and applicants are able to retest during the same session. Other sessions in other cities are available more frequently. Lost of options.